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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

V.

RYAN ALLEN SISEMORE,
a/k/a Ryan Allan Sisemore,
VICTOR EASLEY,
OSCAR VARGAS,
RONNIE RICHARD TURNER,
a/k/a Ronnie Allen Turner
a/k/a Ronnie Richard Allen Turner
a/k/a Ronnie Richard Alle Turner, and
FIL FILIMON GUITRON III,

Defendants.

Case No.14-CR-70886-MAG

REVISED STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME UNDER SPEEDY
TRIAL ACT AND RULE 5.1 FROM MAY 6, 2015
TO JUNE 23, 2015 FOR ALL DEFENDANTS

STIPULATION

Defendants Ryan Allen Sisemore, Victor Easley, Oscar Vargas, Ronnie Richard Turner, and Fil Filimon Guitron III (collectively, the “Defendants”) were charged by complaint in the above-referenced matter in the Northern District of California with conspiracy and possession with intent to distribute a controlled substance, to wit: heroin. In accordance with court orders, the Defendants were released following their arrests and placed in residential drug treatment programs the Eastern or Northern Districts of California. The Defendants have since completed their in-patient programs and remain under the supervision of pretrial officers.

Since their initial appearance on the aforementioned charges, the Government has produced discovery related to numerous drug deals, including audio-video recordings. Following production of discovery, defense counsel and the Government have engaged in discussions about possible pre-indictment resolutions. The Government recently proposed considering Defendants for the District’s new Conviction Alternatives Program and defense counsel has asked for time to discuss this option with their clients. As such, the parties request additional time to discuss the potential, alternative resolution and evaluate the Defendants’ suitability for the new program.

The preliminary hearing in this matter is presently scheduled on May 6, 2015 and the parties hereby request that it be continued to June 23, 2015. The parties make this request time to allow for reasonable time for the effective preparation of counsel and to ensure continuity of continuity of counsel. (One of the undersigned defense counsel has an upcoming trial.) Additionally, the parties’ request is reasonable in light of the difficulties associated with defense counsel conferring with their clients, many of whom reside in the Eastern District. Based on preliminary discussions regarding the potential alternative resolution, the parties do not anticipate needing an additional continuance beyond the new requested date.

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1 For all of the reasons stated, the parties believe that good cause exists to exclude and waive time
2 under Federal Rule of Criminal Procedure 5.1(c) and (d) through June 23, 2015, taking into account the
3 public interest in the prompt disposition of a criminal case and Defendants' consent, and to exclude time
4 under the Speedy Trial Act. 18 U.S.C. § 3161.

5 IT IS SO STIPULATED.

6
7 DATED: May 4, 2015

8 /s/
KATIE BURROUGHS MEDEARIS
9 Assistant United States Attorney

10 DATED: May 4, 2015

11 /s/
ANGELA MILELLA HANSEN
12 Counsel for Defendant Fil Guitron, III

13 DATED: May 4, 2015

14 /s/
JULIA MEZHINSKY JAYNE
15 Counsel for Defendant Ryan Sisemore

16 DATED: May 4, 2015

17 /s/
ADAM PENNELLA
18 Counsel for Defendant Oscar Vargas

19 DATED: May 4, 2015

20 /s/
SCOTT ALAN SUGARMAN
21 Counsel for Defendant Ronnie Turner

22
23 DATED: May 4, 2015

24 /s/
KENNETH HOWARD WINE
25 Counsel for Defendant Victor Easley
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~~[PROPOSED]~~ ORDER

For the reasons stated by the parties, the Court finds that the aforementioned request is supported by good cause and made with the consent of Defendants. Fed. R. Crim. Proc. 5.1(c) and (d). The Court therefore finds that an exclusion of time between May 6, 2015 and June 23, 2015 is merited under Federal Rules of Criminal Procedure Rule 5.1(c) and (d) and the Speedy Trial Act under 18 U.S.C. § 3161 and moves the date of the preliminary hearing to June 23, 2015.

IT IS SO ORDERED.

Dated: May 5, 2015


HONORABLE KANDIS WESTMORE
United States Magistrate Judge